

# EXHIBIT A



**NAILAH K. BYRD  
CUYAHOGA COUNTY CLERK OF COURTS  
1200 Ontario Street  
Cleveland, Ohio 44113**

**Court of Common Pleas**

**NOTICE OF  
July 1, 2025 16:20**

By: JUSTIN E. HERDMAN 0080418

Confirmation Nbr. 3542025

CITY OF CLEVELAND

CV 25 110189

vs.

HASLAM SPORTS GROUP, LLC, ET AL.

**Judge:** LAUREN C. MOORE

**Pages Filed:** 3

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO  
GENERAL DIVISION**

THE CITY OF CLEVELAND,

Plaintiff,

v.

HASLAM SPORTS GROUP, LLC;  
CLEVELAND BROWNS FOOTBALL  
COMPANY LLC; CLEVELAND BROWNS  
STADIUM COMPANY LLC

Defendants.

CASE NO. CV-25-110189

JUDGE LAUREN C. MOORE

Notice of Stay in Federal Court Action

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**PLAINTIFF CITY OF CLEVELAND'S NOTICE OF  
STAY OF FEDERAL COURT ACTION**

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The City of Cleveland hereby notifies this Court of new developments in *Cleveland Browns Football Company, LLC v. City of Cleveland*, No. 1:24-cv-01857 (N.D. Ohio 2024), the Browns' federal case that purported to challenge the Modell Law's constitutionality.

The City previously notified this Court of its pending motion, filed June 27, 2025, to hold all federal-court deadlines in abeyance until the Browns address how the proposed Haslam Law impacts their third federal complaint. *See* 07/27/2025 Notice of Motion to Hold Federal Court Deadlines In Abeyance. On June 30, 2025, the federal court entered an order on that motion:

**Order [non-document] partially granting Defendants' [51] Motion to Hold Deadlines in Abeyance.** At this time, the Court declines to order Plaintiffs to address the implications of the pending budget legislation. However, all deadlines are held in abeyance, and this action is stayed until further Order of the Court.

ECF 51, *Cleveland Browns Football Company, LLC v. City of Cleveland*, No. 1:24-cv-01857 (N.D. Ohio June 30, 2024).

To be clear, the federal action—which turns on the constitutionality of the Modell Law—is now stayed indefinitely. If it were not obvious before, it is now: this Ohio action, focused on the Browns’ breach of their lease, is the only way to resolve the claims between these parties and provide the much-needed finality that both parties seek.

Respectfully Submitted,

Dated: July 1, 2025

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**CERTIFICATE OF SERVICE**

I certify that on July 1, 2025, I electronically filed the foregoing with the Clerk of Court using the electronic filing system, which will send electronic notice of this filing by email to all registered users that have entered an appearance in this case.

Respectfully submitted,

*/s/ Justin E. Herdman*  
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Justin E. Herdman  
*One of the Attorneys for Plaintiff*  
*The City of Cleveland*